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6 *Attorneys for Defendant*

7 *Amber Fryer*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 EUGENE COINS, JR.,

11 Plaintiff,

12 v.

13 FRYE, et al.,

14 Defendants.

Case No. 3:17-cv-00090-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO  
SERVE DISCOVERY RESPONSES TO  
PLAINTIFF'S INTERROGATORIES  
(SET ONE) (First Request)**

15 Defendant, Amber Fryer, by and through counsel, Aaron D. Ford, Attorney General of the State  
16 of Nevada, and Dennis W. Hough, Deputy Attorney General, hereby submit this Motion for Extension of  
17 Time to Serve Discovery Responses to Plaintiff's Interrogatories, set one, (First Request). This Motion  
18 is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and  
19 Authorities, and all papers and pleadings on file in this action.

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 **I. ARGUMENT**

22 Defendant respectfully requests a fourteen (14) day extension of time out from the current  
23 deadline of August 21, 2019, to serve responses to Plaintiff's Interrogatories, set one, in this case.  
24 Counsel for Defendant is confronted with numerous competing deadlines and a high workload due to  
25 staffing changes in the Office of the Attorney General.

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1 However, such obstacles are currently being resolved and the requested extension of time should afford  
2 Defendant adequate time to serve discovery responses in this case.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

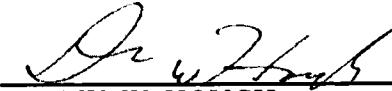
4 When an act may or must be done within a specified time, the court may, for  
5 good cause, extend the time: (A) with or without motion or notice if the court  
acts, or if a request is made, before the original time or its extension expires; or  
6 (B) on motion made after the time has expired if the party failed to act because of  
excusable neglect.

7 Defendant's request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will  
8 allow for thorough responses to Plaintiff's discovery requests. The requested fourteen (14) day  
9 extension of time should permit Defendant time to adequately research and respond to Plaintiff's  
10 discovery requests. Defendant asserts that the requisite good cause is present to warrant the requested  
11 extension of time.

12 For these reasons, Defendant respectfully requests a fourteen (14) day extension of time from  
13 the current deadline to serve discovery responses in this case, with a new deadline to and including  
14 Wednesday, September 4, 2019.

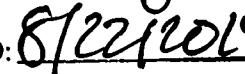
15 DATED this 21st day of August 2019.

16 AARON D. FORD  
17 Attorney General

18 By: 

19 DENNIS W. HOUGH  
20 Deputy Attorney General

21 *Attorneys for Defendants*

22 IT IS SO ORDERED  
23   
24 U.S. MAGISTRATE JUDGE  
25 DATED: 

## **CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 21st day of August, 2019, I caused to be deposited for mailing a true and correct copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO SERVE DISCOVERY RESPONSES TO PLAINTIFF'S INTERROGATORIES (SET ONE) (First Request)**, to the following:

Eugene Coins, #87350  
Warm Springs Correctional Center  
P.O. Box 7007  
Carson City, NV 89702

Pela M. Hernandez

**An employee of the  
Office of the Attorney General**